



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

JUN 17 2016

REPLY TO THE ATTENTION OF:

**CERTIFIED MAIL 7009 1680 0000 7642 2925**  
**RETURN RECEIPT REQUESTED**

Mr. Craig Stevens  
Quality Assurance Engineer  
Cadillac Plating Corporation  
23849 Groesbeck Highway  
Warren, Michigan 48089

Re: Request for Information  
Cadillac Plating Corporation  
EPA I.D. No.: MID006004451

Dear Mr. Stevens:

By this letter, the U.S. Environmental Protection Agency requests information under Section 3007 of the Resource Conservation Act (RCRA), as amended, 42 U.S.C. § 6927. Section 3007 authorizes the Administrator of EPA to require Cadillac Plating Corporation (the facility or Cadillac Plating), to submit certain information.

This request requires Cadillac Plating to submit certain information relating to the EPA compliance evaluation inspection conducted on November 18, 2015, at its facility located at 23849 Groesbeck Highway, in Warren, Michigan. We are requiring this information to determine the facility's compliance status with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. The attachment specifies the information you must submit.

Cadillac Plating must submit this information within fourteen (14) calendar days of receiving this request to:

U. S. Environmental Protection Agency  
Attention: Bryan Gangwisch  
Mail Code LR-8J  
77 West Jackson Boulevard  
Chicago, Illinois 60604

Cadillac Plating may, under 40 C.F.R. Part 2, Subpart B, assert a business confidentiality claim covering all or part of the information it submits in the manner described in 40 C.F.R. § 2.203(b). We will disclose the information covered by a business confidentiality claim only to the extent



allowed under 40 C.F.R. Part Subpart 2, Subpart B. Cadillac Plating must make any request for confidentiality when it submits the information since any information not so identified may be made available to the public without further notice.

Cadillac Plating must submit all requested information under an authorized signature with the following certification:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in response to this Information Request. Based on my review of all relevant documents and my inquiry of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. After conducting a reasonable inquiry, I also certify that the enclosed documents are a complete and correct response to the Request for Information as of the time this response was made. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Should the signatory find, at any time after submitting the requested information, that any portion of the submitted information is false, misleading or incomplete, the signatory must notify U.S. EPA. Knowingly providing false information, in response to this request, may be actionable under 18 U.S.C. §§ 1001 and 1341. We may use the requested information in an administrative, civil or criminal action.

This request is not subject to the Paperwork Reduction Act, 44 U.S.C. §§ 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Failure to comply fully with this request for information may subject Cadillac Plating to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

You should direct questions about this request for information to Bryan Gangwisch, of my staff, at (312) 886-0989.

Sincerely,



Julie Morris  
Chief, Compliance Section 2  
RCRA Branch  
Land and Chemicals Division

Enclosure

cc: Tracy Kecskemeti, MDEQ – SEMI District, [kecskemetit@michigan.gov](mailto:kecskemetit@michigan.gov)  
John Craig, MDEQ – Lansing HQ Office, [craigj@michigan.gov](mailto:craigj@michigan.gov)  
Lonnie Lee, MDEQ – Lansing HQ Office, [leel@michigan.gov](mailto:leel@michigan.gov)  
Steve Sliver, MDEQ – Lansing HQ Office, [silvers@michigan.gov](mailto:silvers@michigan.gov)

## REQUEST FOR INFORMATION

### **Definitions**

All terms not defined herein shall have their ordinary meaning, unless such terms are defined in Section 1002 of RCRA, 42 U.S.C. § 6901, *et seq.*, or Volume 40 of the Code of Federal Regulations, in which case such statutory or regulatory definitions shall apply.

The following definitions shall apply to the following words as they appear in this Information Request:

1. "Cadillac Plating" or "you" means Cadillac Plating Corporation, its subsidiaries, parent companies, sister companies, affiliates, and/or any employee, officer, contractor, or agent thereof, and/or any employee, officer, contractor or agent thereof.
2. "Authorized representative" means the person responsible for the overall operation of a facility or an operational unit (i.e., part of a facility), e.g., the plant manager, superintendent or person of equivalent responsibility. The authorized representative should be authorized to respond on behalf of Cadillac Plating.
3. "Certification" means a statement of professional opinion based upon knowledge and belief.
4. "Responsible person" means an officer or agent who is authorized to respond on behalf of Cadillac Plating.
5. The terms "document" and "documents" mean any object that records, stores, presents, or transmits information. "Document" shall include, but not be limited to:
  - (a) writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including (by way of illustration and not by way of limitation) any of the following:
    - (1) invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order;
    - (2) letter, correspondence, fax, telegram, telex, postcard;
    - (3) record book, minutes, memorandum of meetings and telephone and other conversations, telephone messages, inter or intraoffice communications;
    - (4) agreement, contract, and the like;
    - (5) log book, diary, calendar, desk pad, journal, scrapbook;
    - (6) bulletin, circular, form, pamphlet, statement;
    - (7) report, notice, analysis, notebook;
    - (8) graph or chart; or
    - (9) copy of any document.
  - (b) microfilm or other film record, photograph, or sound recording on any type of device;

- (c) any tape, disc, or other type of memory generally associated with computers and data processing, together with:
  - 1. the programming instructions and other written material necessary to use such disc, or disc pack, tape or other type of memory; and
  - 2. printouts of such disc, or disc pack, tape or other type of memory; and
- (d) attachments to, or enclosures with, any document as well as any document referred to in any other document.

6. "The Facility" means the property at 23849 Groesbeck Highway, Warren, Michigan.

7. The term "waste" or "wastes" means trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge, including, but not limited to, containers for temporary or permanent holding of such wastes.

8. The terms "and" and "or" shall be construed either disjunctively or conjunctively, as necessary, to bring within the scope of this information request any information which might otherwise be construed to be outside its scope.

9. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions.

## **Instructions**

1. You must provide a complete and separate response to each of the questions or requests set forth below. Precede each answer with the number of the Request for Information to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.
2. In preparing your response to each question, consult with all present and former employees and agents of the facility who may be familiar with the matter to which the question pertains.
3. In answering each question, identify all contributing sources of information.
4. If you are unable to answer a question in a detailed and complete manner, or if you are unable to provide any of the information or documents requested, indicate the reason for your inability to do so. If you have reason to believe that there is an individual who may be able to provide more detail or documentation in response to any question, state that person's name and last known address and phone number and the reasons for your belief.
5. If you cannot provide a precise answer to any question, please approximate and state the reason for your inability to be specific.
6. If anything is deleted or redacted from a document produced in response to this Request for Information, state the reason for and the subject matter of the deletion.
7. If a document is requested but is not available, state the reason for its unavailability. In addition, identify any such document by author, date, subject matter, number of pages, and all recipients and their addresses.
8. An authorized representative or responsible person must sign the certification in Attachment B and return it with the response to this Request for Information.
9. Unless otherwise specified, the information must be provided for the three year period immediately preceding your receipt of this Request for Information.

## Requests

1. Identify all documents consulted, examined, or referred to in the preparation of the answers to these requests, and provide copies of all such documents. Each document that is produced shall be produced in a manner that designates the specific numbered information request item(s) to which the document is responsive. Each document submitted shall be clearly and precisely identified by its title, author, date of preparation, and subject matter.
2. Identify the full name, title and telephone number of all persons consulted in preparing the answers in response to this Request for Information. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any information request or who may be able to provide additional responsive documents, identify such persons.
3. Provide a complete description of all seven plating lines at Cadillac Plating. Describe what process (including but not limited to surface chemistry, physical alterations, formulations of metal or chemical layer applications, electroplating and/or chemical conversion coatings of the steel parts) occurs at each phase/bath.
4. Provide a complete description of how trivalent chromium is utilized (including but not limited to surface chemistry, physical alterations, formulations of metal or chemical layer applications, electroplating and/or chemical conversion coatings of the steel parts) in the plating process on steel parts.
5. Provide a complete description of how hexavalent chromium is utilized (including but not limited to surface chemistry, physical alterations, formulations of metal or chemical layer applications, electroplating and/or chemical conversion coatings of the steel parts) in the plating process on steel parts.
6. Describe if any of the facility's plating lines' rinses (acid rinses, trivalent and hexavalent chrome rinses, cleaner rinses and any and all plating rinses) and overflow are separated out and treated separately, or confirm that all of the facility's rinses and overflows from all of the plating lines are commingled and flow to the on-site waste water treatment portion of the facility.
7. Provide the following certification by a responsible corporate officer:

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am



aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of Corporate Officer

